

SEMET RESIDUE PONDS FOCUSED FEASIBILITY STUDY AMENDMENT – SUMMARY OF REVISIONS

The following summarizes revisions made to address the comments in the New York State Department of Environmental Conservation's (NYSDEC's) January 20, 2017 letter, and was developed by OBG on behalf of Honeywell International, Inc. For ease of review, NYSDEC comments are listed first in *italics* followed by the summary of revisions in **bold** text.

1. *Page 1, Paragraph 4, Sentence 2, Section 1.2. It is recommended that this sentence be replaced with the following text. "The selected remedy included measures to prevent the migration of contaminated groundwater, and to manage and treat the Semet residue. These components of the remedy are further described below."*

The original text was replaced as recommended.

2. *Page 1, Section 1.2. It is recommended that the subheading, "Groundwater Remedial Alternative" be replaced with "Groundwater Migration Remedial Component." Please revise.*

The original subheading was replaced as recommended.

3. *Page 1, section 1.2. Information on the design for the Semet lakeshore and Trib 5A groundwater collection systems, including the dates of the design periods, should be briefly described here.*

Two sentences were added in section 1.2. identifying that the Semet lakeshore and Trib 5A groundwater collection systems were constructed in accordance with the respective NYSDEC approved design reports, referenced in the text.

4. *Page 4, Paragraph 4, sentence 1, Section 2; Figure 2. It is stated here that the updated total estimated volume of Semet Residue prior to demonstration removal efforts is 49,000 cy. Is this accurate? The volume of total volume of Semet Residue shown on figure 2 is 44,250 cy. Please revise as necessary.*

The estimated volume of Semet Residue prior to demonstration removal efforts is 49,000 cy, as referenced in the text. Figure 2 was revised to indicate that 5,200 cy of stringer pond material is located on Pond 2, where it was placed during the Tributary 5A collection trench construction.

5. *Page 5, Paragraph 2, Section 3.1. The first sentence should be revised to state "Semet Residue and/or other visibly contaminated soil/fill material, which meet the acceptance criteria..."*

As discussed with Tracy Smith on January 24, 2017, the first sentence on Page 5, Paragraph 2, Section 3.1. was revised to state that: Semet Residue which meets the acceptance criteria at a RCRA-permitted thermal processing for beneficial reuse facility would be excavated from the site, to the extent practicable. Semet Residue which does not meet acceptance criteria and contaminated material located below and in proximity of the ponds, and in the Brushy Cleared Area which exceed Site cleanup goals for pond residue-related contaminants will be evaluated in a site-wide Feasibility Study.

6. *Page 5, Paragraph 6, Section 3.1. "Willis Avenue" should be added before GWTP. Please revise.*

On page 5, Paragraph 6, Section 3.1. "Willis Avenue" has been added before GWTP.

7. *Page 6, Table 3-1. Additional details for the cost estimates (similar to those provided in a feasibility study) should be provided in tables attached to the FFS Amendment.*

The previous cost summary table has been removed from the text. The text now references the attached Table 1 – Total Estimated Remaining Costs – Off-Site Thermal Processing for Beneficial Reuse, for additional cost details.

8. Page 7, Table 3-2, Section 3.3. In the title for the table, replace “with” with “to”. Also, the anticipated duration for “Off-site Thermal Processing for Beneficial Reuse” should be revised from “2-3 years after completion of 2016 demonstration” to “2-3 years”.

The title for table 3-2 has been revised as recommended. The anticipated duration for “Off-Site Thermal Processing for Beneficial Reuse” has been revised as recommended.

9. Page 8, Paragraph 1, Sentence 2, Section 4. The sentence should be revised to ~~“The remedy~~ **Remedial alternatives for to address contaminated media material** remaining at the site following Semet Residue remediation will be evaluated in a site-wide Feasibility Study”

Section 4 has been revised to be consistent with the response provided to Comment 5. The newly added Sentence 1 on Page 8, Paragraph 1, Section 4 is: “The selected remedy for the Site includes measures to prevent the migration of contaminated groundwater, and to manage and treat the Semet Residue.” **Page 8, Paragraph 1, Section 4, Sentence 3 was replaced with:** “Semet Residue which does not meet acceptance criteria and contaminated material located below and in proximity of the ponds, and in the Brushy Cleared Area which exceed Site cleanup goals for pond residue-related contaminants will be evaluated in a site-wide Feasibility Study.”

10. Figure 1. Please confirm the western extent of the Semet barrier wall (e.g., does it extend west of Tributary 5A/the lakeshore access gate) and revised the figure as necessary.

The western extent of the Semet barrier wall is correct as shown on Figure 1 and does extend west of the Tributary 5A/Lakeshore access gate.